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8 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MAKSIM ZAITSEV,

15 Defendant.

No. CR 2:25-cr-00154-SPG

JOINT STIPULATION FOR A PROTECTIVE  
ORDER REGARDING INFORMATION FROM  
PERSONNEL FILES

PROPOSED ORDER FILED SEPARATELY

17 Plaintiff, United States of America, by and through its counsel  
18 of record, the United States Attorney for the Central District of  
19 California and Assistant United States Attorney Rahul R.A. Hari and  
20 Neil P. Thakor, and defendant Maksim Zaitsev ("defendant"), by and  
21 through his counsel of record, DFPDs Shannon M. Coit and Ryan  
22 Shelley (collectively the "parties"), for the reasons set forth  
23 below, request that the Court enter the proposed protective order  
24 (the "Protective Order") governing the use and dissemination of  
25 information from law enforcement personnel files.  
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1           **Introduction and Grounds for Protective Order**

2           1. Defendant is charged in this matter with a violation of 18  
3 U.S.C. § 111(a)(1), (b): Assault on a Federal Officer Resulting in  
4 Bodily Injury.

5           2. A protective order is necessary because the government is  
6 in possession of materials containing sensitive law enforcement  
7 personnel files relevant to its discovery obligations.

8           3. The purpose of this Protective order is to (a) allow the  
9 government to comply with its discovery obligations while protecting  
10 this sensitive information from unauthorized dissemination, and (b)  
11 provide the defense with sufficient information to adequately  
12 represent defendant.

13           **Definitions**

14           4. The parties agree to the following definitions:

15           a. Protected Documents or Information includes any  
16 information obtained from law enforcement personnel records,  
17 including, but not limited to, complaints of official misconduct.  
18 This definition applies retroactively to any personnel records  
19 already produced in the course of this case.

20           **Terms**

21           5. The parties jointly request the Court enter the Protective  
22 Order, which will permit the government to produce PROTECTED  
23 INFORMATION in a manner that preserves the privacy and security of  
24 third parties. The parties agree that the following conditions in the  
25 Protective Order will serve these interests:

26           a. Use of the protected documents and the information  
27 contain herein is limited to this criminal matter and, in  
28 particular, said protected documents and the product of the same

1 shall not be utilized by the prosecuting agency, the defendant or  
2 prosecution or defense of any other criminal or civil proceeding.

3           b. Under no circumstances shall the protected documents,  
4 or the information contained therein, be retained, compiled, stored,  
5 used as a data base, or disseminated, in any form, except for the  
6 purposes of this criminal proceeding in accordance with this  
7 protective order or by further order of the court.

8           c. Use of the protected materials and the information  
9 contained therein is limited to authorized persons working for the  
10 prosecution, the defense and the court on this specific criminal  
11 matter.

12           d. If the protected material is included in any court  
13 documents, those documents shall be submitted under seal.

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1 e. In the event that any confidential police personnel  
2 records are used in any court proceeding in this case, counsel shall  
3 take all reasonable steps to maintain its confidentiality during  
4 such use.

5 IT IS SO STIPULATED.

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7  
8 DATED: April 29, 2025

BILAL A. ESSAYLI  
United States Attorney

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10 LINDSEY GREER DOTSON  
Assistant United States Attorney  
Chief, Criminal Division

11  
12 /s/  
13 RAHUL R.A. HARI  
14 NEIL P. THAKOR  
Assistant United States Attorneys

15 Attorneys for Plaintiff  
16 UNITED STATES OF AMERICA

17 DATED: April 30, 2025

/s/\*  
18 SHANNON M. COIT  
19 RYAN SHELLEY  
Deputy Federal Public Defenders

20 Attorneys for Defendant  
21 MAKSIM ZAITSEV

22 \*Filed with email consent.  
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